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April 6, 1998

BY HAND

Hon. John C. Crary  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223

Re: Case 97-C-0271

Dear Secretary Crary:

Enclosed is an original and 25 copies of the Pre-filing Statement of Bell Atlantic - New York in Case 97-C-0271.

Respectfully submitted,

*Paul A. Crotty (wRA)*

Attachment

Copy to: Case 97-C-0271 service list

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**In the Matter of  
Petition of New York Telephone Company for  
Approval of Its Statement of Generally  
Available Terms and Conditions pursuant to  
Section 252 of the Telecommunications Act of  
1996 and Draft Filing of Petition for  
InterLATA Entry pursuant to Section 271 of  
the Telecommunications Act of 1996.**

**Case 97-C-0271**

**PRE-FILING STATEMENT OF BELL ATLANTIC - NEW YORK**

**April 6, 1998**

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Case 97-C-0271

**PRE-FILING STATEMENT OF BELL ATLANTIC - NEW YORK**

This "Pre-filing Statement" sets forth additional commitments<sup>1</sup> that New York Telephone Company, doing business as Bell Atlantic-New York (Bell Atlantic-NY or the Company), will make to the Federal Communications Commission (FCC) in connection with an application for long distance relief pursuant to Section 271 of the Telecommunications Act of 1996. Bell Atlantic-NY requests that the Chairman of the New York Public Service Commission (Public Service Commission) indicate whether, assuming Bell Atlantic-NY meets each milestone listed in Appendix 1 and discussed below,<sup>2</sup> it will issue a positive recommendation on the Bell Atlantic-NY filing to the FCC.<sup>3</sup> Bell Atlantic-NY recognizes that the Public Service Commission will monitor compliance with each milestone and that a commitment to issue a positive recommendation would be subject to Bell Atlantic-NY satisfying all milestones to the Commission's satisfaction.

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<sup>1</sup> Unless modified herein, the initial commitments found in the Company's Draft Application for InterLATA Authority, filed February 14, 1997, and Supplemental Petition, filed November 6, 1997, remain in effect.

<sup>2</sup> As a sign of good faith, Bell Atlantic-NY has, in fact, begun many of the steps discussed below.

<sup>3</sup> These commitments do not bind any other Bell Atlantic operating telephone company in any other State.

If Bell Atlantic-NY receives authority to provide interLATA services pursuant to the granting of an application under Section 271, the Company will keep the commitments set out herein, unless they are found to violate law by any court of competent jurisdiction. If the Chairman of the Public Service Commission, pursuant to Section 12 of the Public Service Law, other member of the Public Service Commission, or the Public Service Commission as a whole support Bell Atlantic-NY's Section 271 petition, such support does not, in any way, waive or abdicate their powers or responsibilities under state or federal law.

This document also describes a series of significant steps that Bell Atlantic-NY has taken to (1) resolve concerns raised in reaction to the Company's earlier filings; and (2) further open the New York market to competition.

In addition, until such time as the Public Service Commission determines they are no longer necessary, where an existing interconnection agreement with a Competitive Local Exchange Carrier (CLEC) in New York State incorporates performance standards and remedies, such standards and remedies will not be unilaterally withdrawn by Bell Atlantic-NY. Such standards and remedies will continue to be offered by Bell Atlantic-NY in subsequent negotiations with those CLECs upon expiration of the existing agreements and similarly will be negotiated in good faith with other CLECs who request negotiation of such terms and conditions.

Finally, Bell Atlantic-NY acknowledges that any CLEC support of this document, like Bell Atlantic-NY's commitments herein, is based on its totality and on the specific circumstances in New York State. Such support cannot be cited as precedential in any other jurisdiction.

## **L ACCOUNT SERVICING**

Both Bell Atlantic-NY and the CLECs are served by having a clearly defined understanding of Account Manager responsibilities. As a result, the Company will develop a comprehensive account management guide, describing the managers' roles and responsibilities. Volume 1 of the CLEC Handbook will be supplemented through the insertion of a summary of account management responsibilities.<sup>4</sup> To provide parity with the way Bell Atlantic-NY handles large retail accounts, Account Managers will interact with other Bell Atlantic-NY units on the CLECs' behalf regarding resold or unbundled services. This is already in effect with resale customers, and Bell Atlantic-NY will implement a similar program for the CATC by the end of April 1998.

As part of the continuing effort to increase the accessibility and responsiveness of Account Managers, Bell Atlantic-NY has formalized the procedures for coverage in the event Account Managers are absent from the office for more than one day for vacations, illness, training and similar occurrences. In such circumstances, Bell Atlantic-NY will designate an alternative account manager, provide each carrier with the name of that alternate account manager, and provide a voice mail greeting indicating when the alternate manager should be contacted.<sup>5</sup>

In addition, Bell Atlantic-NY is providing Account Managers with tools to increase their accessibility, efficiency and capability to provide timely responses to CLEC inquiries. The Account Managers will receive laptop computers, pagers and cell phones, on or before April 15, 1998.

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<sup>4</sup> The summary of account management responsibilities will be placed on the Bell Atlantic TIS Website in April 1998.

<sup>5</sup> This effort has also been completed.



Bell Atlantic-NY is also in the process of adding a director and two technical support staff to work with the Account Managers, to help provide technical resources within the Account Management Organization, support the Account Managers in dealing with complex technical issues associated with network build-outs, and make the managers more available for other functions. These additional personnel will be in place in April 1998.

By way of further assurance of Bell Atlantic-NY's commitment to provide prompt responses, the Company has reinforced and formalized its commitment to return customer calls on the day in which they are received, if the manager is in the office, but in no event later than the next business day.<sup>6</sup>

In response to questions regarding how Account Managers are allocated among CLECs, Bell Atlantic-NY has prepared a description of what key measurements are utilized in allocating managers and in evaluating when to add additional managers.

Bell Atlantic-NY currently evaluates its managers on a semi-annual basis, based primarily on qualitative measures. A portion of Account Managers' compensation currently reflects the results of the semi-annual evaluation. The qualitative measures which provide the basis of these evaluations will include the feedback obtained from CLECs on managerial performance. In addition, for staffing purposes, the Company considers:

- The number of accounts handled
- Geographical coverage of the accounts handled
- Number of network build outs
- Number of network planning sessions
- Number of pre-ASR (Access Service Request) sessions
- Number of NDR (Network Design Review) sessions
- Number of customer training sessions coordinated
- Number of calls received and returned within one business day

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<sup>6</sup> This task was completed on March 1, 1998.

- Number of electronic OSS (Operation Support System) interfaces established

As a way of obtaining CLEC feedback on specific issues of concern and customer satisfaction, Bell Atlantic-NY will facilitate sponsorship of, and actively participate in, a users group for facilities-based CLECs, similar to the Telecommunications Resellers' Association Reseller User Group. Bell Atlantic-NY agrees to consider and provide formal responses to all user group recommendations and act upon them where appropriate.

#### A. Escalation of CLEC Inquiries

For a forty-eight hour period beginning with the completion of an order, CLECs may report non-service affecting and service affecting conditions relating to that order to the Telecommunications Industry Services Operation Center (TISOC) in order to receive status reports on resolving the condition. If a non-service affecting condition is unresolved two hours after being reported, the TISOC service representatives will so inform the CLEC. The CLEC may then choose to escalate the matter to the first level TISOC manager. If the non-service affecting condition remains unresolved after three additional hours, the first level manager will so inform the CLEC and the matter may then be escalated to the second level TISOC manager. If the non-service affecting condition remains unresolved by the end of the day, the second level manager will so inform the CLEC, and the matter may then be escalated to the TISOC director. For reports concerning service-affecting conditions relating to an order, the same procedure will be followed, but with one hour shorter timeframes.

Recognizing the need for clearly defined internal escalation procedures, Bell Atlantic-NY has produced internal escalation procedures for the resale center and will do so for the carrier account team center by May 1998. These procedures have been made available on the Bell

Atlantic TIS Website and will be communicated to all CLECs at their initial and monthly operations meetings.

Bell Atlantic-NY has developed a database to track escalation incidents for both resale and unbundled elements. The tracking of escalations for resale began January 1998, while the unbundled elements tracking began in March 1998. The database will allow Bell Atlantic-NY and DPS staff to assess the types of escalations that are occurring, their frequency, and the overall percentage of orders that are escalated. Staff may review the records in this database.

**B. Documentation and Information Bell Atlantic-NY Provides to CLECs**

In order to allow CLECs to interact efficiently with Bell Atlantic-NY systems and employees, Bell Atlantic-NY has committed to routinely update the information contained in the CLEC handbooks. Individual page or section updates will be sent to CLECs via mail, and all updates will be posted on the Website at least quarterly.

Bell Atlantic-NY will continue to provide notification of "quiet periods" resulting from tandem software upgrades or switch replacements, and has committed to provide notice of changes in those schedules as they occur, and at least 30 days in advance of any period. In urgent circumstances, such as when service-affecting software glitches or hardware/software compatibility problems occur, Bell Atlantic-NY will provide notice to all CLECs as soon as Bell Atlantic-NY becomes aware of the need to modify the quiet period schedule. Such circumstances arise very infrequently (in the last two years only three such occasions arose).

When end office switches are replaced, recent change memory activity (for both CLECs and Bell Atlantic-NY) is stopped for a 24 hour period prior to the cutover. There are three such replacements planned for 1998, the last of which is scheduled to be completed by May 31, 1998. The CLECs will be notified 30 days in advance of cutovers about which CLECs do not currently

have notice. Bell Atlantic-NY will also continue to provide and update the list of central offices that have known physical collocation space constraints, as well as those that are identified as having only unconditioned space remaining. Beginning April 15, 1998, these will be provided to both CLECs and the Public Service Commission, and will also be posted on the Website.

### **C. The Carrier Account Team Center and Resale Center**

As with Account Management, both Bell Atlantic-NY and the CLECs benefit from a clearly defined identification of staff contacts and their responsibilities. Therefore, Bell Atlantic-NY has developed a list of these contacts, which was included in the CLEC handbook and is available on the Website.

To ensure that these centers are providing quality service, Bell Atlantic-NY measures the number of requests received, as well as the timeliness and accuracy with which they are processed (e.g., firm order confirmation timeliness, service order query timeliness, completion notification timeliness and processing intervals). Order accuracy is measured through "% Installation Troubles in 30 Days" and through representative quality reviews. The "% Installation Troubles in 30 Days" is reported to the Public Service Commission, and representative quality reviews are available for review by the DPS staff.

To provide parity with the way Bell Atlantic-NY handles large retail accounts, Account Managers will interact with other Bell Atlantic-NY units on the CLECs behalf regarding resold or unbundled services. This is already in effect with resale customers, and Bell Atlantic-NY will implement a similar program for the CATC by the end of April 1998.

## **II COMBINATIONS OF ELEMENTS**

Bell Atlantic-NY will provide to CLECs combinations of network elements, and the complete Unbundled Element Platform to provide CLECs with residential and business POTS service and residential and business Basic Rate Interface ISDN service (BRI ISDN switch port and premium loop), in the geographic areas and on the terms reflected on the chart that follows.

In making the commitment to provide unbundled element platforms (UNE-P) at the rates set out in the chart, Bell Atlantic-NY recognizes that it will continue to suppress its access billing and enable purchasers of UNE-P to bill for access for the duration of its commitment. This treatment of access charges will continue for existing platforms after the expiration of the availability of new platforms. Finally, Bell Atlantic-NY realizes that this document does not immunize it from having to comply with valid FCC regulations.

RESIDENCE & BUSINESS POTS AND ISDN PLATFORM (WITH OR WITHOUT OS/DA)							
AREA		VOICE GRADE			ISDN-BRI		
Description <sup>7</sup>		NRC	Monthly <sup>8</sup>	Duration <sup>9</sup>	NRC	Monthly	Duration
Residence							
Zone 1		\$0	\$0	4 years	\$0	\$0	4 years
Zone 2		\$0	\$0	6 years	\$0	\$0	6 years
Business POTS							
Zone 1 <sup>10</sup>		\$0	\$6	4 years	\$0	\$0	4 years
Zone 2		\$0	\$2	6 years	\$0	\$0	6 years

At the end of the Duration period identified in the Chart, Bell Atlantic-NY will (1) enable CLECs to assemble the underlying elements of the platforms themselves through reasonable methods or to migrate their existing links to their respective switches through reasonable methods and in a reasonable timeframe; and (2) if CLECs do not choose to assemble the platform for themselves, Bell Atlantic-NY may begin to assess an increasing additional recurring charge(s) that would, over the course of two years, raise the price of the unbundled platform to the CLEC to substantially the cost of similar resold lines. In any event, Bell Atlantic-NY would not pursue raising the platform price unless and until it had successfully implemented access arrangements

<sup>7</sup> Zone definitions are the same as those established by the Commission in Cases 94-C-0095, 95-C-0657 and 91-C-1174.

<sup>8</sup> The monthly charges listed (for both voice grade and ISDN-BRI) are in addition to the sum of the UNE prices and other non-recurring and recurring charges established by the Commission.

<sup>9</sup> The duration periods (for both voice grade and ISDN-BRI) commence upon the availability to CLECs of OSS upgrades, scheduled for August 1998, to the satisfaction of the Public Service Commission.

<sup>10</sup> In central offices in New York City where two or more CLECs are collocated to provide local exchange service through unbundled links at the commencement of the duration period, UNE-P will not be available for business customers.

that enabled CLECs to combine the elements themselves and implemented a reasonable process to enable CLECs to migrate their links to their switches in a timely manner.

Throughout Bell Atlantic-NY's serving area, CLECs will have the ability to recombine elements themselves through the use of smaller collocation cages, shared collocation cages, and through virtual collocation. In addition, Bell Atlantic-NY will demonstrate to the Public Service Commission that competing carriers will have reasonable and non-discriminatory access to unbundled elements in a manner that provides competing carriers with the practical and legal ability to combine unbundled elements. Among the issues to be discussed in Bell Atlantic-NY's demonstration is the feasibility of "non-cage collocation." Bell Atlantic-NY will continue its current, ubiquitous offering of the platform until such methods for permitting CLECs to recombine elements are demonstrated to the Commission.

In all geographic areas and for all classes of service (regardless of whether the unbundled element platform is available), subject to technological feasibility, Bell Atlantic-NY will provide combinations of UNEs less than the total platform (that do not involve combining the Company's link with the Company's port) at Public Service Commission-approved unbundled element prices.

This undertaking is made in light of the actions the Public Service Commission has taken in setting the terms and conditions of interconnection in New York. Bell Atlantic-NY may seek authority from the Public Service Commission for an additional charge to the requesting carrier for these services. The establishment of such additional charge will be in the discretion of the Public Service Commission or other agency with the statutory authority to review these rates. Collocation will not be required for these combinations unless it is technically necessary.

If Bell Atlantic-NY combines for CLECs unbundled loop and transport elements (including multiplexing where required and, when technically feasible, concentration), such

combinations (i) may extend from an end user to a CLEC collocation cage or CLEC premises, but may not in any manner be connected to a Bell Atlantic-NY switch; and (ii) may be used to provide switched local exchange service and associated switched exchange access service.

### **III. INTERCONNECTION AND UNBUNDLED NETWORK ELEMENTS**

#### **A. Interconnection**

##### **1. Electronic Trunk Ordering**

Bell Atlantic-NY currently uses the Network Data Mover (NDM) to provide the electronic ordering ability to the IXC's and CLEC's for trunk provisioning. This system, which has been used extensively by the IXC's over numerous years for handling Network Interconnection Access Service Requests (ASRs) for trunking, was modified to handle trunk requests from CLEC's.

From a system hardware and software perspective, the existing infrastructure of a T1.54 line network interface and associated system software already exists for the CLEC's to use. This includes such CLEC's as Teleport, AT&T and MCI. Bell Atlantic-NY will ensure that the NDM System is available to all CLEC's, and will review its capabilities with those that are current system users by May 15, 1998.

##### **2. Interval for Network Interconnection Trunks**

Since the start of 1997, Bell Atlantic-NY has reduced its trunk provisioning interval from 43 business days to a fourth quarter average of 33 business days. Bell Atlantic-NY will eliminate all past due orders for network trunk interconnection through infrastructure additions and process improvements by June 1, 1998.



Bell Atlantic-NY expects to further reduce the trunk provisioning interval over the course of 1998, and is striving to meet an interval objective of 18 days for all interconnection trunks, excluding only orders greater than 192 trunks and complex jobs, which will carry intervals of 30 business days or negotiated due dates, respectively, and initial deployment of new CLEC/Bell Atlantic-NY interconnection trunk groups, which will be scheduled on a negotiated interval.

Industry-wide use of the forecasting process developed in the carrier-to-carrier collaborative process will be critical to achieving the stated objective for all trunk types.<sup>11</sup> These forecasts are to be provided semi-annually, with a minimum six months lead time before the requested in service date. Bell Atlantic-NY has provided the CLECs with all details on how and when forecasts should be provided, and has committed to meet the 18 business day interval for augments to interconnection trunks forecasted in accordance with those procedures beginning May 15, 1998. Orders for trunks that were not previously forecasted, or were under-forecasted by more than 10% in a single office, will be subject to a 45 business day interval, if facilities are available; if facilities are not available, the order will be treated as a six month forecast and the interval for such trunks will be no more than 198 days.

### **3. Availability of Two-Way Trunking**

#### **a) Current Status**

Two-way traffic exchange trunks provide for the transmission and routing of traffic in both directions on a single trunk group by both the CLEC and Bell Atlantic. Although Bell Atlantic-NY currently provides over three thousand two-way trunks to one CLEC in New York

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<sup>11</sup> Bell Atlantic-NY will treat these forecasts as confidential, and will not share them with its retail marketing personnel or outside parties.

State for the exchange of local interconnection traffic, these trunks are provided on a flat-rated basis, with reciprocal compensation based upon periodic and mutual traffic studies.

MCI and other CLECs have indicated an interest in two-way trunks on a measured-use basis. Bell Atlantic-NY has agreed to develop such a service offering, and will continue with the trial of two-way trunking currently underway with MCI until its successful conclusion.

**b) Future Offering**

Bell Atlantic-NY and MCI have initiated an operational trial for two-way trunks with usage measurements, for mutual approval, which will enable the parties to assess the success of the trial in July. Upon successful completion of the trial, Bell Atlantic-NY will deploy, upon receipt of a specific CLEC request, the necessary additional equipment, and will have a general service offering of two-way trunks, to both end offices and tandems, on a measured-use basis by August 31, 1998. If the trialed equipment is unable to handle reasonably foreseeable call volumes, Bell Atlantic-NY commits to continuing to investigate reasonable, cost-effective methods for providing measured, two-way trunking, and to have a general service offering for measured, two-way trunking within a Commission-designated period after a successful operational trial of such a method. This two-way trunking offering, with reciprocal compensation based on number and type of minutes of use, will only be available on trunks that use SS7 signaling and have the Hewlett Packard measurement equipment (or equivalent) in place to measure the traffic in both directions. Bell Atlantic-NY may propose rates to recover any additional costs of measured two-way trunking.

Based on the technology used in the trial, measured two-way trunking will require the Hewlett Packard CDR7 SS7 Usage Measurements and Monitoring System (or equivalent) for the purpose of measuring and recording AMA billing information on two way SS7 trunk groups

simultaneously in both directions between the Bell Atlantic-NY and CLEC switches. The HP CDR7 system (or equivalent) must be installed at the STP pairs connected to the SS7 links. The system must be in place at the appropriate STP locations and must have connectivity to the appropriate SS7 links in order to provide two way trunking with usage measurement.

Design and implementation of the trunk groups will be based on forecasts from the CLEC. The trunks will be interconnected from the Bell Atlantic-NY end office to the CLEC switch, and Bell Atlantic-NY and the CLEC will provide transport on the two-way trunk groups with DS-1 interfaces at the switches. Bell Atlantic-NY will assume trunk servicing and administrative responsibility for such two-way trunk groups.

#### **4. 64 Clear Channel Availability**

##### **a) Network Infrastructure Investments**

Bell Atlantic-NY has addressed the concerns related to 64 Clear Channel availability through extensive infrastructure additions and software upgrades. The equipment needed to provide 64 Clear Channel capability in a 4-ESS tandem is a SM-9 circuit pack plug-in card, which will provide for 24 DS-0 channels of 64 kilobit Clear Channel capability. Although earlier versions required lengthy provisioning intervals and necessitated significant rearrangements, the installation of 4E21 software provided two additional capabilities to provision 64 Clear Channel more efficiently. Specifically, the new software permits the replacement of 1 SM-1 card at a time, and permits initial provisioning of 100% 64 Clear Channel.

##### **b) Current and Future Clear Channel Availability**

The capacity of an XTSI frame is 168 T-1s or 4,032 DS-0 channels of 64 Kilobit capacity. The XTSI frame equipment needed to provision the 64 Clear Channel trunks on the 4ESS is new technology, which will now be used to satisfy all types (56/64 kb) of interconnection trunks on a

going forward basis. Bell Atlantic-NY has made 39,384 DS-0 channels of 64 Kilobit clear channel capacity available in the fourth quarter of 1997. During 1998, Bell Atlantic-NY will add an additional 180,000 DS-0 channels of clear channel-capable capacity, giving Bell Atlantic-NY an additional 219,384 DS-0 channels of clear channel-capable capacity in 1998.

Bell Atlantic-NY will strive to provision all future clear channel service requests (excluding complex jobs and orders greater than 192 trunks) within the standard intervals prevailing for all other trunk types.

#### 5. Tandem Sector Routing

Particular calls can take either a "direct" route or a "tandem" route from one switching center to another. These direct routes are high usage groups that allow the routing of calls directly from the originating to the terminating point. When all trunks in a high usage group are busy, calls attempting to access that high usage group are directed as overflow to other alternate routes, normally through the tandem. A high usage group is always engineered to be backed by an alternate route via a tandem connection which acts as a final trunk group for call completion. This interchange and overflow of calls between direct end office trunks and alternate tandem connections is the normal and customary way of providing efficient routing within the Bell Atlantic-NY network.

The access tandem as an intermediate switching system interconnects a large number of switches with a geographic community of interest by trunk group. This integration of local end offices and a serving access tandem with geographic communities of interest is called tandem sector routing. However, because the cost of routing a call through an access tandem is greater than that for routing a call directly, a direct path (direct end office trunks) may satisfy demand

more economically if the community of interest is high between two points. In these circumstances only the overflow would then be handled through the serving access tandem.

In other circumstances, there is a community of interest between two points that lie outside of the normal tandem serving sector. Where there are large volumes of calls, for example, between Fire Island or South Hampton, Long Island (two vacation spots popular with NYC residents) and locations in New York City, a different routing plan is employed called alternate tandem sector routing. Alternate tandem sector routing works on the same theory as direct end office trunking, which is to complete calls in the most efficient manner possible.

Bell Atlantic-NY will provide similar routing, upon request, to CLECs for their trunking. Since current trunks are paid for based on per-minute usage charges, Bell Atlantic-NY may propose an additional charge for trunks deployed to provide diversity or alternate tandem sector routing.

## **B. Collocation**

Before it can be considered to have achieved the collocation requirements of the §271 checklist, Bell Atlantic-NY will demonstrate to the satisfaction of the DPS staff, that it is able to provision virtual collocation within the prescribed 105 day time interval, and that the installations will function as intended, by July 1, 1998. In addition, CLECs will be able to obtain smaller collocation cages and to share collocation space.

### **1. Forecasting**

Bell Atlantic-NY's ability to meet the provisioning intervals for both physical and virtual collocation is related to its ability to schedule the work and appropriately size its work force. Therefore, Bell Atlantic-NY will request forecasts of anticipated collocation requirements from requesting carriers. This section spells out a forecasting procedure which will be followed

initially. Bell Atlantic-NY recognizes, however, that the procedure set out here may need to be modified because it is not compatible with the forecasting capabilities of the CLECs, the way the local competitive market will develop, or other reasons. Bell Atlantic-NY agrees that, no later than after receipt of the initial forecasts and assessment by Bell Atlantic-NY of its ability to meet forecasted demand based on the forecasts, Bell Atlantic-NY will meet with DPS staff and interested CLECs to consider possible revisions to the forecasting process and resulting actions and obligations. Bell Atlantic-NY agrees that it will meet sooner if, in DPS staff's view, circumstances warrant. If the timing permits, the revisions will be considered in the context of Public Service Commission Case 97-C-0139.

Bell Atlantic-NY will request forecasts on a semi-annual basis, with each forecast covering a two-year period. Information requested will include central office, month applications are expected to be sent, requested in-service month, preference for virtual or physical, and square footage required (physical) or high-level list of equipment to be installed (virtual).<sup>12</sup>

With regard to the use of forecasting data, Bell Atlantic-NY will post aggregate forecasting data on the Website within three weeks of the close of the forecasting window. Posting will include the COs requested, the number of virtual and physical applications for each CO, and any known space constraints. In addition, the Company will perform initial reviews of requested COs to identify potential problem sites based on the next six months of forecasts, consider forecasts in staffing decisions, and enter into planning discussions with forecasting CLECs to validate forecasts, discuss flexibility in potential trouble areas and assist in application preparation.

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<sup>12</sup> Bell Atlantic-NY will treat these forecasts as confidential, and will not share them with Bell Atlantic-NY retail marketing personnel or outside parties.

Formal forecast requests will be sent to the CLECs semi-annually, as indicated above. The first forecast will be used to gauge whether demand is greater than current estimated Bell Atlantic-NY capacity (i.e., more than 20 per month, more than 8 in a geographical area, or more than 3 on a single day). Bell Atlantic-NY will provide a written report in May to the Public Service Commission regarding the analysis of the forecasts, subsequent discussions with the CLECs, and resulting action plans for both Bell Atlantic-NY and the CLECs. Several scenarios could develop:

- a. If the near-term (6-month) forecast is within Bell Atlantic-NY's current capacity, Bell Atlantic-NY will be accountable for meeting standard intervals subject to the limitations described in the Space Limitations and the Collocation Process sections of this document.
- b. If the overall forecast indicates spikes in demand, Bell Atlantic-NY will attempt to smooth the demand (by mutually agreeing to schedule jobs in months with less demand) through discussions and negotiations with the CLECs.
- c. Should Bell Atlantic-NY and the CLECs fail to agree to smooth demand, Bell Atlantic-NY will estimate the increase in cost and capacity, both internal and external (vendors), within three weeks of the disagreement and work with DPS staff to determine whether such additional expenditure is warranted and to evaluate cost recovery options.
- d. If the forecasts indicate a sustained need to provide more than Bell Atlantic-NY's current capacity, Bell Atlantic-NY will need to augment its workforce and work with the various vendors to prepare for the increase in demand. Bell Atlantic-NY will ramp up its workforce based on forecasts if it is assured that the CLECs are similarly held accountable for the accuracy of their forecasts. The Public Service Commission will examine the issue of accountability following the May 1998 report to the Public Service Commission.

DPS staff and Bell Atlantic-NY acknowledge that the forecasting process for collocation arrangements is new. Therefore, after the initial forecasts are received from CLECs, and Bell Atlantic-NY has assessed its ability to meet the forecasted demand, DPS staff and Bell Atlantic-

NY will meet to consider possible revisions to the forecasting process and resulting actions and obligations.

Unforecasted demand will be given a lower priority than forecasted demand. Bell Atlantic-NY will make every attempt to meet standard intervals for unforecasted requests; however, should unanticipated requests push demand beyond Bell Atlantic-NY's capacity limits, Bell Atlantic-NY will negotiate longer intervals as required (and within reason). As a rule of thumb, forecasts received less than three months prior to the application date may postpone the interval start date as follows:

<u>Forecast Received</u>	<u>Interval Start Date Commences</u>
No Forecast Received	3 months after application date
Forecast received 1 month prior to application date	2 months after application date
Forecast received 2 months prior to application date	1 month after application date
Forecast received 3 months prior to application date	On the application date

All such interval adjustments will be discussed with the CLEC at the time the application is received. Although formal forecast requests will be submitted on a semi-annual basis, the CLECs should update the near-term (6-month) forecasted application date going forward.

Where Bell Atlantic-NY has a written guarantee of reimbursement, it will examine forecasts for offices in which it is necessary to condition space, and discuss these forecasts with CLECs to determine the required space to be conditioned. If Bell Atlantic-NY commits to condition space based on forecasts, CLECs assigned space will give Bell Atlantic-NY a non-refundable deposit equal to the application fee, with a signed commitment to fund its proportionate share of the conditioning costs for its space and for unused space, consistent with



the Public Service Commission's March 2, 1998 Order in Case 95-C-0657, et al., on non-price terms and conditions for collocation (March 2 Order).

## **2. Space Limitations**

When no space is available for physical collocation, Bell Atlantic-NY will inform the Public Service Commission as soon as it knows it will be unable to fulfill a request, based on applications, 6-month forecasts, or as soon as it otherwise becomes aware that there is no further space available for physical collocation. Bell Atlantic-NY will post a list of all such sites on its Website, and will update the list as additional constraints become known.

When forecasts indicate that all requests cannot be fulfilled in a particular central office due to limited available space, Bell Atlantic-NY will inform all forecasting CLECs of the total square footage available and the total number of CLECs requesting space in that CO. It will offer each CLEC an equal share of the central office space, and request applications immediately, with appropriate fees, to reserve the space. Each CLEC will have one month to respond. If a CLEC does not respond within the specified time, its apportioned share will be allocated evenly among those that do respond.

If there is not enough space available to provide all requesting CLECs with a minimum configuration (i.e., 25 sq. ft. for recombinations, 100 sq. ft. for standard transmission equipment), a drawing will be held for the space, with appropriate guidance and participation from the Public Service Commission. Bell Atlantic-NY will inform each CLEC of the number of requesting CLECs and the quantity of CLECs that can be accommodated in the available space. It will request applications immediately, with appropriate fees, to enter the drawing. Each CLEC will have one month to respond or be ineligible for the drawing. Bell Atlantic-NY will then forward